

BEFORE THE HEARINGS PANEL

IN THE MATTER of the Resource Management Act 1991 ('the Act')

AND

IN THE MATTER of Proposed Plan Change 9 to the Hawke's Bay
Regional Resource Management Plan

**STATEMENT OF REPLY EVIDENCE OF PAWEŁ RAKOWSKI FOR HAWKE'S BAY
REGIONAL COUNCIL**

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1. INTRODUCTION

- 1.1 My name is Pawel Rakowski.
- 1.2 I hold the position of Senior Groundwater Modeller at Salt Lake Potash (**SO4**) in Perth, Australia. I have been employed by SO4 since March 2019.
- 1.3 My previous position was a Senior Groundwater Modeller at Hawke's Bay Regional Council, which I held between April 2015 and February 2019.
- 1.4 I have a total of 15 years of working experience in groundwater modelling and hydrogeology in various industries (including local government, consultancy, mining and construction), and various countries including Australia, New Zealand, UK and Poland.
- 1.5 I hold the qualification of Master of Science in Environmental Engineering, awarded at Warsaw University of Technology in 2006. The subject of my Master's thesis was related to groundwater modelling of impacts of public water supply pumping on stream depletion.
- 1.6 I am a member of the International Association of Hydrogeologists and New Zealand Hydrological Society.
- 1.7 I have been undertaking part-time contract work for HBRC over the last 2 years, advising on the Heretaunga Aquifer Groundwater Model.
- 1.8 I developed a groundwater model for Heretaunga Aquifer system, completed in 2018, as documented in the following publications:
 - (a) Rakowski P. and Knowling M. (2018a). "4997 Heretaunga Aquifer Groundwater Model Development Report." HBRC, May 2018.¹
 - (b) Rakowski, P. (2018b). "5018 Heretaunga Aquifer Groundwater Model Scenarios Report." HBRC, August 2018.²
- 1.9 Findings from this work have led to improved understanding of the impact of groundwater abstraction on water bodies in the Heretaunga Plains.
- 1.10 This groundwater model forms the basis of many TANK policies, including the development of allocation limits.

¹ Available for download at <https://www.hbrc.govt.nz/documents-and-forms/reports-search/details/10975>.
² Available for download at <https://www.hbrc.govt.nz/documents-and-forms/reports-search/details/10965>.

- 1.11 I developed a model-based stream depletion assessment tool that can be used for consenting purposes by HBRC, as described in Rakowski P (2018), "Heretaunga Aquifer Stream Depletion Assessment - Zone Delineation and Stochastic Response Function Methodology." HBRC, May 2018.
- 1.12 I was involved in the TANK stakeholder working group and delivered technical information to the group, including presentations about:
- (a) Heretaunga groundwater model development;
 - (b) nitrate transport modelling;
 - (c) stream depletion assessment;
 - (d) assessment of impact of pumping bans on Ngaruroro River flow;
 - (e) assessment of stream flow augmentation;
 - (f) sustainability of aquifer abstraction; and
 - (g) development of the stream depletion assessment tool.
- 1.13 I presented my work on the Heretaunga Aquifer Groundwater Model and Stream Depletion tool at New Zealand Hydrological Society conferences in 2016, 2017 and 2018 and at the International Association of Hydrogeologists conference in Korea in 2018.
- 1.14 I developed models for Source Protection Zone (**SPZ**) delineation for Hastings District Council abstractions, as documented in the Appendix to this reply evidence.
- 1.15 I have prepared this evidence in my capacity as an expert, and although this is not a court hearing I acknowledge that I have read and understand the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note dated 1 December 2014. I have complied with it when preparing my evidence, and I agree to comply with it when I give any oral evidence. Other than where I state that I am relying on the evidence of another person, my evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

Purpose and scope of evidence

- 1.16 The purpose of this reply evidence is to address matters raised in the statement of evidence from Brett Chapman for Hastings District Council.
- 1.17 I provide narrative on matters raised by other witnesses only where I consider that what they are saying may not be correct or that it should be qualified.
- 1.18 For the avoidance of doubt, any failure to cross reference or specifically discuss any matter raised by other witnesses does not mean I agree with that evidence of the other witnesses.

2. KEY FACTS AND ASSUMPTIONS RELIED ON

- 2.1 In preparing my evidence, the key documents and evidence I have reviewed are:
 - (a) TANK Section 32 Evaluation Report
 - (b) Brett Chapman's statement of evidence on behalf of Hastings District Council and Napier City Council, regarding SPZs;
 - (c) Annette Sweeney's statement of evidence on behalf of Hastings District Council and Napier City Council;
 - (d) my letter report describing development of stream depletion zones for HDC abstractions using a stochastic numerical method (Appendix);
 - (e) a report detailing development of SPZs for HDC using an analytical method WhAEM: "Source Protection Zones for Public Supply Bores Hastings Urban Area" Tonkin & Taylor Ltd (2018);
 - (f) Moreau et al. (2014) "Capture Zone Guidelines for New Zealand" GNS, April 2014;³ and
 - (g) WhAEM software documentation: Kraemer et al. "Working with WhAEM," 2018

³ Available for download at <https://envirolink.govt.nz/assets/Envirolink/R6-2-Capture-zone-guidelines-for-New-Zealand.pdf>.

3. EXECUTIVE SUMMARY

- 3.1 Evidence from Hastings District Council has requested an SPZ delineated using a combination of analytical and numerical modelling.
- 3.2 In my professional opinion, the numerical method of SPZ delineation, which has been used for proposed Plan Change 9 (PPC9), is more appropriate to use for the Heretaunga aquifer system than the analytical WhAEM method, due to multiple limitations of the analytical method. The numerical method is able to produce a more realistic shape of SPZ, because it can much better account for flow conditions in the Heretaunga aquifer system.
- 3.3 The numerical method of SPZ delineation should be considered an advancement of, rather than addition to, the analytical method. In my view, it would not be reasonable to continue using a larger SPZ delineated with a simpler method, if an SPZ delineated with an appropriate more advanced model is available.
- 3.4 In principle, simpler analytical methods produce more conservative (and typically larger) SPZs due to higher uncertainty. The reason for using a more advanced method is to reduce uncertainty and enable delineation of a less conservative (and typically smaller) SPZ.
- 3.5 The suggested combination of SPZs from both analytical and numerical methods goes against this principle.
- 3.6 Merging of analytical and numerical methods produces an unnecessarily conservative SPZ.

4. SELECTION OF APPROPRIATE MODELLING METHOD

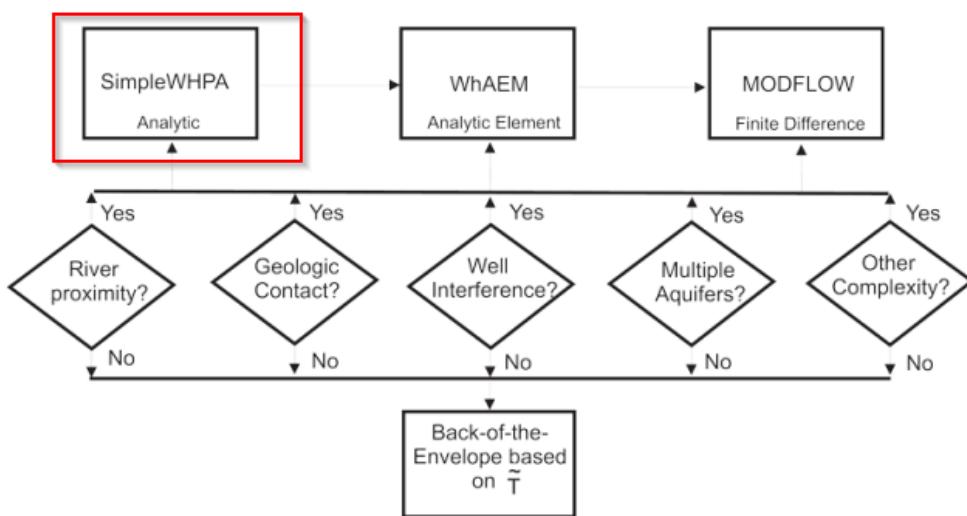
- 4.1 In paragraph 46, Mr Chapman states: “HDC propose to retain the ‘combined’ SPZ until further evidence is available to decide which modelling approach is accurate or further modelling can be undertaken to address the current model limitations.”
- 4.2 In terms of which modelling (analytical or numerical) is more “accurate”, in my opinion, it may never be practically possible to verify how “accurate” these methods are. However, it can be demonstrated that numerical modelling has clear advantages and is a preferred method for delineating Heretaunga Aquifer SPZs.
- 4.3 Capture Zone Guidelines for New Zealand (Moreau et al., 2014) offer some guidance on selection of different methods of SPZ delineation. Numerical modelling is described as “Most accurate delineation method” (Moreau et al. 2014, Table 2.3). Guidance from Moreau et al. (2014) lists a number of limitations with analytical

methods, in particular the Uniform Flow Equation method used for analytical SPZ for HDC abstractions:

- (a) Does not cover well pumping interference
 - (b) Does not take account of hydrologic boundaries (e.g., streams, lakes)
 - (c) Is suitable when the following assumptions about the aquifer are valid:
Homogenous, Isotropic, horizontally infinite, of uniform thickness.
- 4.4 All of these limitations apply to the Heretaunga aquifer system, therefore reducing the suitability of analytical methods in that system.
- 4.5 Capture Zone Guidelines for New Zealand also state that "Generally, the simplest method produces the largest capture zone. It can be used to quickly delineate a conservative capture zone that encompasses a considerable proportion of the "actual" zone." This means that more advanced methods, such as numerical models, could be used to delineate a smaller zone with more certainty. Because of that, in my opinion, a more advanced method should replace a simpler method. In my view, it would not be reasonable to continue using a larger SPZ delineated with a simpler method, if an SPZ delineated with an appropriate more advanced method is available.
- 4.6 Dr Catherine Moore in her review of numerical SPZ report (included in the Appendix) has stated that "The modelling approach adopted by HBRC for delineating the SPZ's for the four Hastings borefields is considered appropriate and represents an advance on the initial work by Tonkin and Taylor in that it accommodates more of the complexity of groundwater flow system, and in particular, the groundwater flow directions and gradients".
- 4.7 Dr Catherine Moore in her review of the numerical SPZ report (included in the Appendix) also suggested improvements to the numerical modelling work that would address potential upscaling errors that can occur when upscaling model parameters in highly heterogeneous alluvial aquifers. This is related to issues such as pathogen transport which can occur in heterogeneous aquifers via "low yield, fast transport" pathways. These improvements are currently the subject of a major collaborative research programme involving HBRC and GNS Science. This work is expected to reduce uncertainty related to SPZs delineation even further.
- 4.8 Table 54 of the Section 32 Evaluation Report identifies a numerical model as an appropriate tool to delineate SPZ takes serving over 5000 people, when artesian conditions are not met. I agree with this specification.

Decision tree for complexity of capture zone delineation method

- 4.9 The image below is copied from the WhAEM software manual and presents a decision tree for complexity of capture zone delineation methods. Increasing complexity occurs from the left to right hand side of the diagram and appropriate models are shown for varying states of complexity. The red box represents the method used for analytical delineation of the Hastings SPZs, with a caveat that river proximity was not used in the assessment, only a simple analytical well-in-uniform-flow solution was used. To clarify, “Simple WHPA” is an option in WhAEM software which includes well-in-uniform-flow solution, rather than a separate software.



- 4.10 The decision tree, provided by developers of WhAEM themselves, identifies that more complex problems require more sophisticated modelling tools, with MODFLOW model identified as appropriate for the most complex cases.
- 4.11 In the Heretaunga aquifer system, all variables listed in the decision tree are present and important: nearby river and streams, complex geometry on the aquifer, well interference, multilayer aquifer system, with other complexities including transient flow conditions, variable (spatially and temporally) groundwater flow direction and gradient, and heterogeneity of the aquifer. Therefore, in my opinion, MODFLOW should be the preferred tool for SPZ delineation in the Heretaunga Aquifer.
- 4.12 The analytical method used to define SPZs for HDC abstractions is one of the simplest methods that could be applied. The analytical method does not take into account the known complexity of the system, including key elements such as spatial gradient, flow direction changes and well interference.

Comparison of WhAEM and MODFLOW

- 4.13 I have prepared a comparison table (Table 1, below) of WhAEM analytical method (as applied by Tonkin & Taylor for analytical SPZ delineation) and MODFLOW (as applied in the Heretaunga Aquifer Groundwater Model).
- 4.14 Table 1 shows that the analytical method has significant limitations, which have importance for the delineation of shape and extent of SPZs.
- 4.15 Most importantly, the analytical method assumes a uniform flow field and gradient, which results in a regular, elongated shape of SPZ. In reality, the flow field and gradient is not uniform. Groundwater flows in different directions depending on location and the gradient changes along the flow path. If flow direction and gradient change within the one-year travel time to the pumping well, this will have a significant effect on shape and size of SPZ.
- 4.16 A numerical groundwater model, such as MODFLOW, is much better at representing flow direction and gradient and will therefore provide a more realistic shape of the SPZ.
- 4.17 Other modelling aspects, such as temporal changes to groundwater flow direction and gradient, heterogeneity of the aquifer, cumulative impact of pumping, surface water features, geological boundaries, will also have an impact on the shape and extent of SPZ, and all of these are better represented in a numerical model.
- 4.18 It is noted that WhAEM software has capability for addressing some of complexities of the Heretaunga aquifer system (such as spatial variability of flow field, surface water features and cumulative effect of pumping). However this capability was not used in the Tonkin & Taylor assessment: only the well-in-uniform-flow solution was used.
- 4.19 The numerical modelling also included a robust stochastic uncertainty analysis, which included identification of 107 model parameter realisations, each of which satisfied model calibration criteria. Each of these realisations produces a slightly different SPZ, and all of these SPZs were combined to define a final SPZ extent. This approach is much more robust than simple sensitivity analysis.

Table 1 Comparison of capabilities of the WhAEM analytical SPZ delineation method and MODFLOW numerical method.

Modelling Aspect	WhAEM (as applied by T&T)	Numerical MODFLOW method (as applied by HBRC)	Importance
Groundwater flow direction	range of values for temporal variability spatial variability not included (except between bore fields)	spatially and temporally variable, based on model calibration, includes seasonal changes	shape of zone
Groundwater gradient			extent of a zone
Heterogeneity of the aquifer	no	spatial variability	shape of zone
Cumulative impact of pumping	no	yes	shape of zone
Surface water features	SPZ truncated at Ngaruroro	all water features included (Ngaruroro, Tukituki, Karamu, spring fed streams)	shape of zone
Uncertainty analysis	sensitivity - range of parameters	uncertainty analysis, 107 model realisations	shape and extent of zone
Geological boundaries	zones truncated at outcrop	respects geometry of the aquifer	shape and extent of zone

5. CLARIFICATIONS OF SOME STATEMENTS IN MR CHAPMAN'S EVIDENCE

- 5.1 In paragraph 43, Mr Chapman states that “HDC and HBRC have developed source protection zones, based on modelled 1 and 10 year groundwater travel upstream of the abstraction point.” This statement requires clarification, as SPZs developed by HBRC (described in the Appendix), used 10-year travel time only as a solution to account for “low yield, fast transport” pathways, and the results should be interpreted as representing one-year travel time with the presence of those fast transport pathways.
- 5.2 Further in paragraph 43, Mr Chapman states that: “The approach to defining SPZs for each of the bore fields was to not only consider them independently of each other but also to consider the combined effects on groundwater travel times and flow direction from all significant takes within the groundwater system.”
- 5.3 WhAEM analytical software does have capability to account for the combined effect of simultaneous pumping (which is what Mr Chapman appears to be referring to in the cited statement). However, it appears from the Tonkin & Taylor report that the analysis was done separately for each abstraction, without accounting for effects of flow interference. This is evident from figures in appendix A of the Tonkin & Taylor

report, which present individual capture zones for each bore field, without any sign of interference. In contrast, numerical modelling (as documented in the Appendix to this reply evidence) does take into account the effects of simultaneous pumping and flow interference.

6. CONCLUSION

- 6.1 In my professional opinion, the numerical method of SPZ delineation that has been used for PPC9 is more appropriate to use for the Heretaunga aquifer system than the analytical WhAEM method, due to multiple limitations of the analytical method. The numerical method is able to produce a more realistic shape of SPZ, because it can much better account for flow conditions in the Heretaunga aquifer system.
- 6.2 The numerical method of SPZ delineation should be considered an advancement of, rather than addition to, the analytical method.
- 6.3 In principle, simpler analytical methods produce more conservative (and typically larger) SPZs due to higher uncertainty. The reason for using a more advanced method is to reduce uncertainty and enable delineation of a less conservative (and typically smaller) SPZ.
- 6.4 The suggested combination of SPZs from both analytical and numerical methods goes against this principle.
- 6.5 Merging of analytical and numerical methods produces an unnecessarily conservative SPZ.
- 6.6 Currently, HBRC and GNS are collaborating in a major research programme related to issues such as pathogen transport which can occur in heterogenous aquifers via “low yield, fast transport” pathways. This work is expected to reduce uncertainty related to SPZ delineation even further.

**Pawel Rakowski
19 May 2021**

APPENDIX: Letter report on numerical modelling of Hastings source protection zones

To: Catherine Moore
From: Paweł Rakowski
Date: 14/12/2018
Subject: Stochastic source protection zone delineation in Heretaunga Aquifer using a numerical groundwater model
File Ref: Description of methodology, and results for Hastings District Council municipal bores.
Cc: 5067
Jeff Smith

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1 Introduction

This short report provides documentation of stochastic source protection zone (SPZ) delineation in the Heretaunga Aquifer using a numerical groundwater model. Results generated for Hastings District Council municipal drinking water supply bores are reported here as a case study.

The purpose of this work was to provide an alternative to SPZs delineated by Tonkin and Taylor (T+T) for Hastings District Council (HDC). T+T (Reynolds, 2018) used the well head analytic model (WhAEM) developed by the USEPA, which uses a relatively simple, one-layer homogeneous aquifer for representing groundwater flow to each well. While the simple modelling approach allows for relatively rapid model development and calibration, conservatism is required via sensitivity analysis to account for large predictive uncertainty. A consequence of the conservatism due to the modelling method used by T+T is that an unnecessary compliance burden may be placed upon resource use activities that are within conservatively large SPZs.

Moreau *et al.* (2014) reported that numerical modelling is the most accurate delineation method for SPZs, but that it often requires more resources to develop, compared to a simple analytical element model (AEM). Numerical methods are more appropriate for complex aquifer systems such as the Heretaunga Aquifer, as they can provide a better representation of aquifer variation and dynamics than simpler methods such as AEM. Usually numerical methods require significantly greater effort to implement, due to set up and calibration requirements. However, in this case, a calibrated stochastic numerical model suite was available from previous work and only required minimum modifications to be used in capture zone analysis.

The purpose of this document is to provide an alternative modelling approach to protection zone delineation that is more accurate than the WhAEM approach. The methodology is described, along with limitations of the numerical modelling and recommendations for future work. As this science is advancing and improving over time, a flexible approach to mapping of source protection zones is recommended for the TANK plan change.

2 Methodology

2.1 Basic principles of the method

The method is based on use of a numerical model suite:

- Transient MODFLOW model, (Harbaugh *et al.*, 2005),
- Followed by a MODPATH model (Pollock, 2016),
- Runs undertaken using a stochastic model version, developed during model calibration and uncertainty analysis using PEST (Doherty, 2016).

This method is appropriate for complex aquifer systems as described in GNS “Capture zone guidelines for New Zealand” and subsequent technical report (Moreau *et al.*, 2014a, 2014b).

Similar applications of this method for delineation of capture zones were used elsewhere in New Zealand, for example in Greater Wellington Region (Toews *et al.*, 2015). Toews *et al.* (2015) provides a fully detailed description of the method, which is not repeated here.

2.2 MODFLOW model set up

Simulations are based on a calibrated groundwater model of the Heretaunga Aquifer (version HPM035) (Rakowski and Knowling, 2018) with model scenario HPM_M3 used as a basis for monthly time steps from 1980 to 2015 (Rakowski, 2018).

This model was modified as follows:

- Simulation time was reduced by limiting runs to 10 years (2005-2015) for transient simulations
- Well boundary conditions were modified by reflecting HDC abstraction scenarios (i.e. previous HDC bores were removed and replaced with new scenario rates applied)
- 4 HDC scenarios were applied, consistent with scenarios used by T+T (Reynolds, 2018) as shown in the Table 1(abstraction rates in L/s)

Table 1: Scenarios and associated abstraction rates (L/s) from Hastings bores

Scenario	1	2	3	4
Eastbourne	501	21	211	191
Wilson	0	0	80	0
Frimley	0	480	210	190
Portsmouth	0	0	0	120

- Pumping rates were distributed evenly between bores within a borefield and kept constant during simulation periods
- Each simulation was modified to save model budget and stress period, and to save all budget components, as required by MODPATH

2.3 MODPATH setup

MODPATH 7 was used with the following settings:

- Backward tracking
- Timeseries analysis
- 9 particles were placed on each face of each cell that contained a scenario pumping well (only HDC wells, with a different set up for each scenario). All wells are in layer 2 of the model.
- Particles were released approximately every 30 days in MODPATH simulations. This allows for tracking particles released during different times (and during different hydraulic conditions in the aquifer). Note that in backward tracking, “release” means a final destination for the particle which is a pumping well. This setup provides for changing flow directions and gradients in the aquifer.
- MODPATH reports time from a “reference” time, set at the end of MODFLOW simulation (June 2015) with time tracked backward. Because particles are released every month, the “time from release” instead of the “time from reference time” had to be calculated during post processing. This allows for tracking how far each particle travels in a given time (e.g. 1 year). This post processing was done in R (R Core Team, 2018).
- MODPATH was set up using the python FloPy package (Bakker et al., 2016)

2.4 Stochastic model runs

Uncertainty analysis was undertaken stochastically using 107 model realisations generated during calibration-constrained Monte Carlo analysis (Knowling et al., 2018). Each of the

realisations met the calibration criteria, despite having different parameter values. This includes calibration to water age and nitrate concentration, which constrains porosity parameters. Stochastic MODPATH runs were undertaken using PEST software (Doherty, 2016).

The PEST setup was modified (templates, well and river generation scripts, remove observations, etc.) to undertake this analysis with a new model with 10 year duration. Four versions of model were used as per HDC scenarios described in [Section 2.2](#).

For each realisation:

- PARREP PEST utility was run to update parameter values (e.g. aquifer conductivity, storage, etc.)
- PEST was run with noptmax = 0 to run the model one time only
- MODPATH files were generated using FloPy for each given scenario (particle locations) and realisation (porosity values)
- Timeseries results and MODPATH listing files were saved for each run
- This process was automated using a python script to automatically generate appropriate files
- Overall the model had to be run $107 \times 4 = 428$ times. Each run time is about 2 hours.
- Runs were parallelised by running several individual processes concurrently.

3 Results and discussion

3.1 Results processing

MODPATH timeseries files were saved and read into R to allow for processing. Pathline files and MODFLOW output files (hds and cbb) were not saved due to very large file sizes (1.5, 0.6 and 3.5 GB respectively)

Timeseries files can be plotted directly as points. However, due to the very large number of points (2 million) this is difficult to present for every scenario and realisation. Instead for each realisation and scenario:

- Timeseries files were converted to spatial points data
- This was converted to a raster, using “rasterize” method from R package “Raster” (Hijmans, 2017). This allows conversion of particle locations to a 100x100m raster, with each raster cell representing minimum time from release
- Timeseries data were filtered to only show particles younger than 365 days
- This filtered data set was rasterised, showing “maximum extent of the 1 year travel time” for given realisation and scenario
- An unfiltered data set (10 year travel time) was also rasterised for visualisation of a conservative 10 year travel time.

This “maximum extent of the 1 year travel time” were mapped to raster with value of 1. Then, rasters for each realisation were added together and divided by the number of realisations. This gives the frequency of occurrence in each raster cell, which is interpreted as probability that flow could originate from this cell during the 1-year period. This can be repeated for any travel time, as required for analysis.

3.2 Conservative assumption for pathogen transport

Following initial discussion with a reviewer (Dr Catherine Moore, GNS Science), additional consideration was given to the appropriateness of the MODPATH method for delineation of source protection zones, especially if the purpose of the zone is to protect against pathogen contamination.

To make this model more conservative and appropriate for pathogen risk assessment, 10-year travel time was also analysed. The justification for this is given below.

MODPATH allows for capture zone delineation for a pumping well for a given maximum travel time such as a 1 year travel time. The size of this capture zone depends predominantly on porosity parameters applied in the model. This parameter was constrained during the process of model calibration and uncertainty analysis, using observed mean groundwater age at the observation bores (Knowling et al., 2018).

A limitation of most regional groundwater flow and contaminant transport models, including the Heretaunga Aquifer model, is that they only allow for simulation of “high yield, slow transport” pathways, but not “low yield, fast transport” pathways. This concept is discussed by Hunt (2017) and is summarised here.

The “high yield, slow transport” pathway refers to a dominant source of water, whilst “low yield, fast transport” pathway refers to a non-dominant source of water. Simulating “high yield, slow transport” is appropriate for solute transport (e.g. nitrates), but pathogen transport can occur via a “low yield, fast transport” pathway. In a gravel aquifer, this process may occur through preferential pathways such as open framework gravels. Even though the contribution of “low yield fast transport” pathway to the pumping well pathway may be very small, it may be significant in terms of risk, because even very small concentrations of pathogens such as viruses may pose a serious health risk.

Detailed modelling of “low yield, fast transport” pathways is currently not possible, due to limitations of aquifer composition data and inability to model these small scale structures. However, this aspect potentially could be modelled stochastically (at smaller scales than covered in by this report).

This limitation of the model means that it is likely to underestimate the extent of one-year pathogen travel time. To add a level of conservatism, the model porosity can be reduced by a prescribed factor. This would result in faster travel times, and thus more extensive capture zones.

It was suggested by the reviewer of this report to reduce porosity by a factor of 10. This would bring the porosity to a level similar to porosity used in the T+T assessment (Reynolds, 2018). Unfortunately when this suggestion was made, the model had already been run in a stochastic mode, with a significant run time (over 1000 processing hours), and there was no time available to repeat these runs. Instead, an alternative was proposed using 10 year travel time instead of 1 year travel time. This has a similar effect as porosity change in the capture zone calculation and doesn’t require re-running the model because the correction is applied in post-processing of modelling results.

There is a potential issue with this approach, as the transient run time of the model was 10 years. In the original set-up, particles were released every month for 10 years and only one year travel time was analysed. This meant that most of the released particles had a chance to travel for one full year (except for particles released in the last year). For the 10 year travel time, only the first set of particles released in the first month had a chance to travel for 10 years and the rest can only travel for shorter time. For example, particles released in year 5 of the simulation can only travel for 5 years before the simulation terminates. This means that more particles are used to delineate earlier travel times and the number of particles used for zone delineation declines towards the end of a simulation, potentially leading to an underestimated size of the capture zone. However, assessment of this issue indicated

that particle trajectory is not greatly affected by transient effects, so this problem is unlikely to have a large effect on the solution (i.e. size of the capture zone), so the setup is considered acceptable.

3.3 Particle traces per realisation

A capture zone can be delineated for each scenario and each realisation. This results in 428 different maps, which is challenging for presentation.

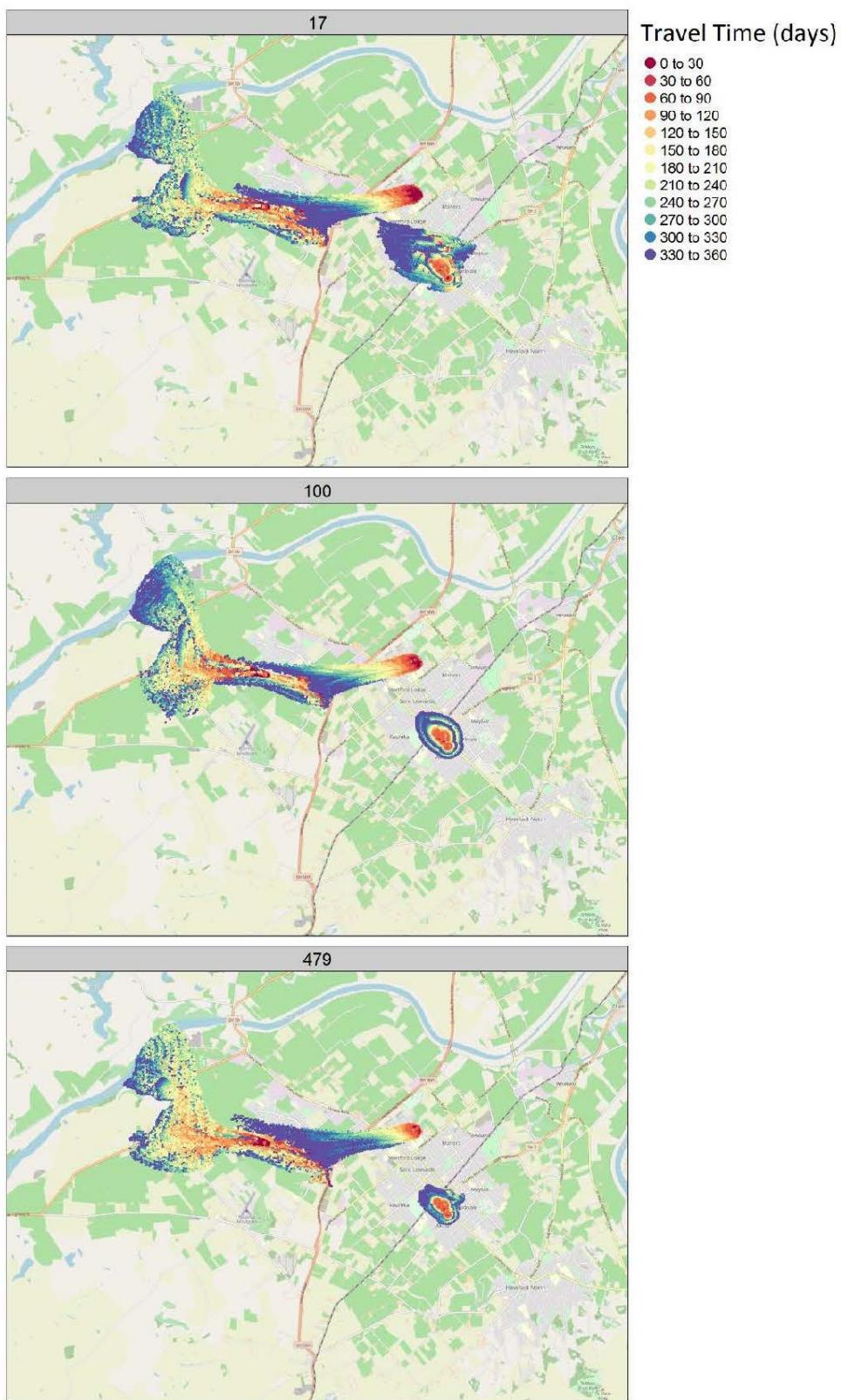


Figure 3-1 presents three selected realisations for all scenarios combined, for one year travel time. Figure 3-1 shows that the extent of one year travel time zone differs significantly between the realisations. Realisation 17 shows that the main cloud of particles is surrounded by a less dense cloud,

which extends further. This can be explained by particles originating in layer 2 of the model, which at some point reach layer 1, which in turn causes change in travel velocity.

Additional figures for remaining realisations are presented in an appendix B and C



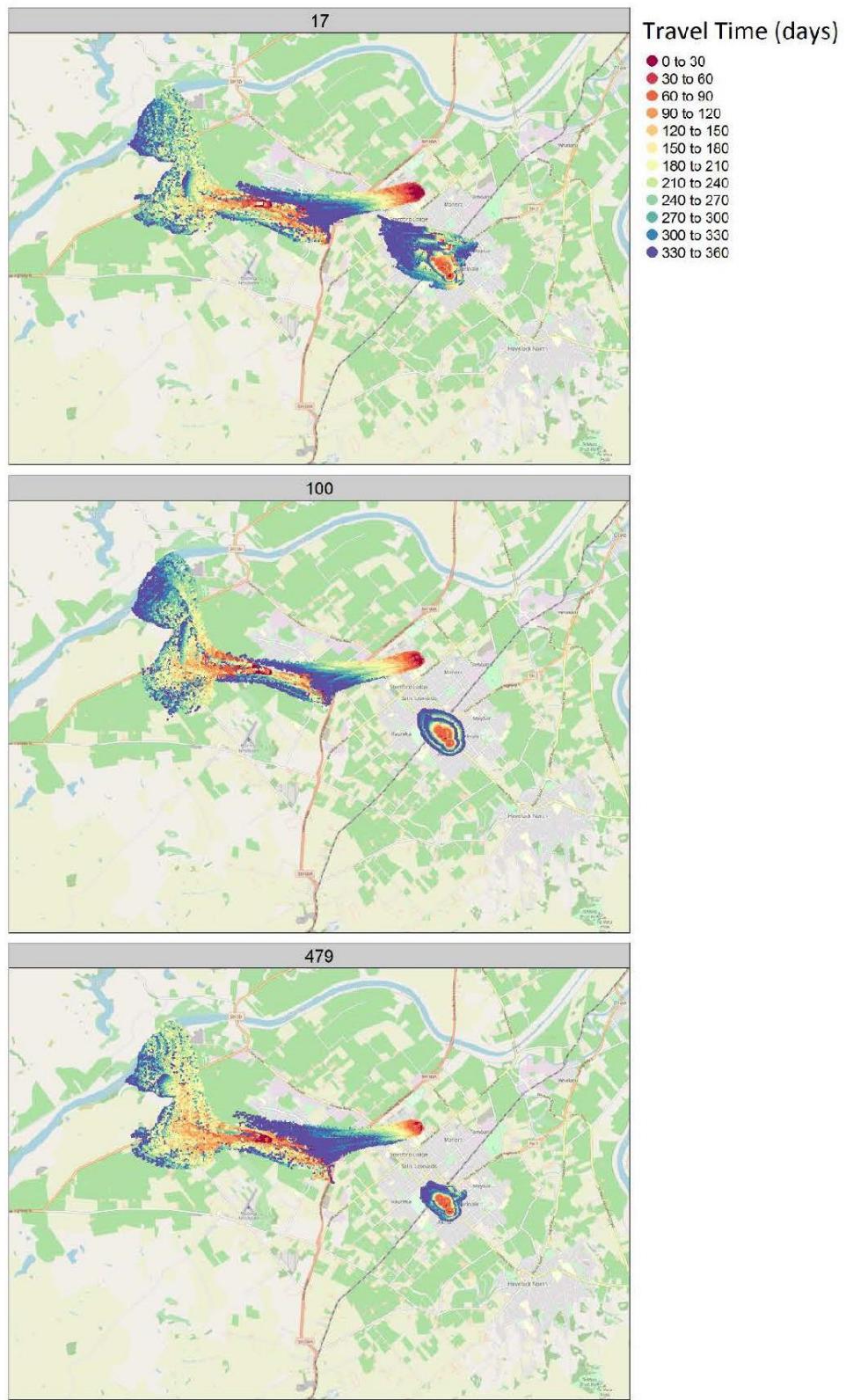


Figure 3-1 One year travel time for selected relations for all scenarios. Colours represent travel time (legend shows the number of days travelled)

3.4 Stochastic results

Probability distribution maps are shown below, for one year and conservative 10 year travel times. Source protection zones developed by T+T are also shown as grey polygons.

Results are presented as probabilities of being in zone 2 (one year travel time) for all model realisations. It is noted from Figure 3-2 that:

- Stochastic zones are wider than zones derived in individual realisations
- When deciding on zones for implementation in planning instruments, decision makers might base this on an agreed statistic, for example 90% probability
- Modelling results indicate that the zone based on one year travel time extends to the losing section of the Ngaruroro River, which has a large upstream catchment and is in connection with the aquifer (the Ngaruroro River loses water to the aquifer). This means that there is potential for any contamination (e.g. animal faeces) in the upper Ngaruroro catchment to be transported with run-off and surface water flow and then enter the aquifer, which can transport it to the drinking water supply within one year. This is especially the case for the Portsmouth and Wilson borefields
- The one year zone also intersects other surface water features, for example Irongate Stream. The Irongate stream normally is spring fed, so water travels from the aquifer to the stream which makes it unlikely to contaminate the aquifer. However, under certain conditions this flow could reverse (e.g. during a flood).
- The 10 year travel time zone is significantly larger than the 1 year zone. The main difference is the extent towards the west. With a 10 year travel time, this zone extends many kilometres west, to the minor losing section of Ngaruroro River. The zone extends beyond the mapped area due to initial set-up of the processing routine, which was focused on the area around Hastings.
- Some of the capture zone falls within the confined and artesian area of the aquifer. Persistent flowing artesian conditions in the aquifer would practically prevent any surface water from entering the aquifer. However, more work is recommended to accurately map the distribution of artesian conditions.

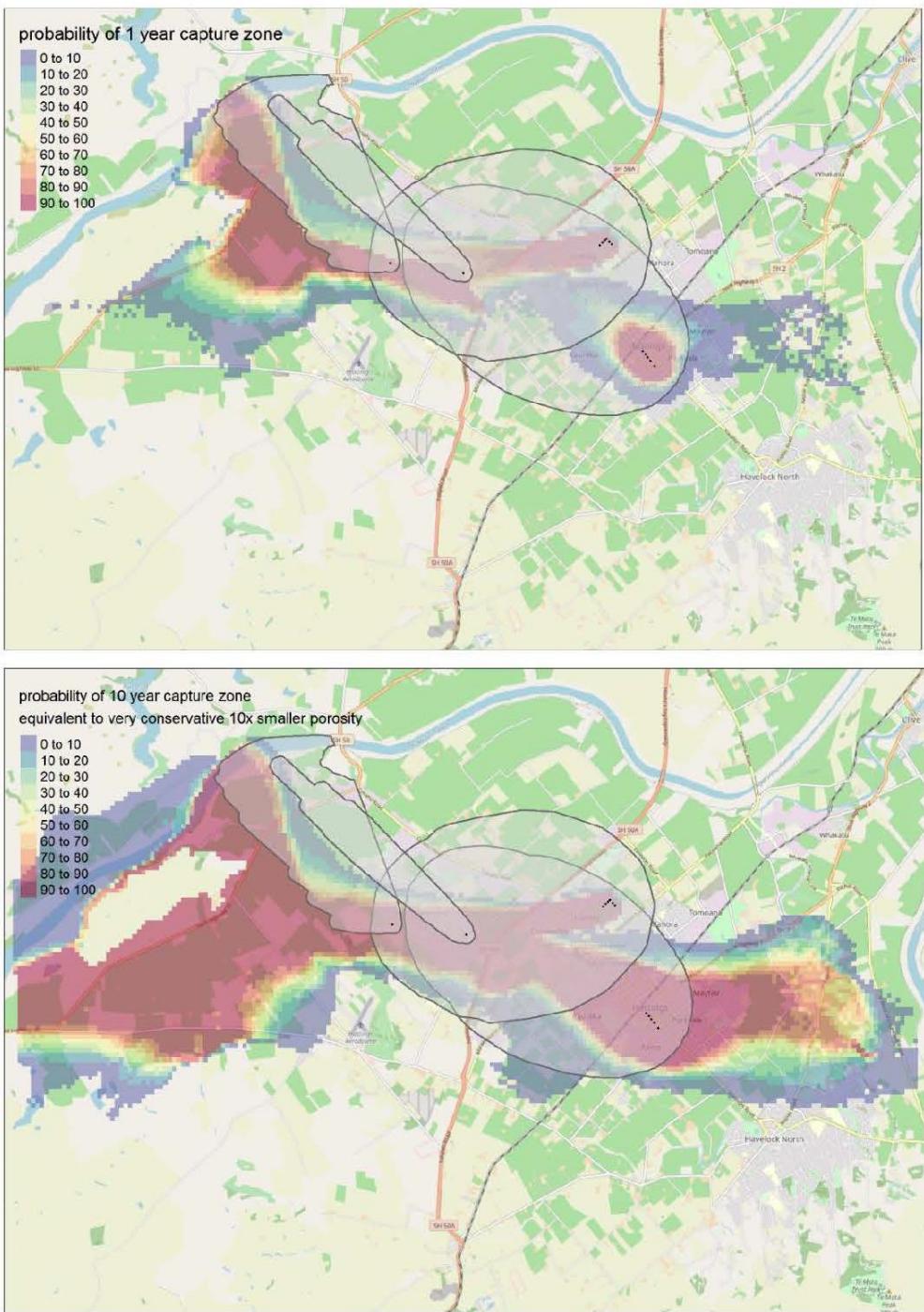


Figure 3-2 Probabilistic capture zones for travel times of one year (top) and 10 years (bottom). Zones with grey shading are those delineated by Reynolds (2018).

3.5 Comparison to Tonkin & Taylor results

These numerical modelling results are different to results reported by Reynolds (2018). This is not unexpected, as the methods used are considerably different. This phenomenon is discussed below.

3.5.1 Flow direction and gradient

The one year travel time zones derived using the numerical model are generally smaller than zones derived by T+T. For example, this is seen between Flaxmere and the Ngaruroro River, where the T+T zone extends in a generally straight line towards the river, whilst the numerically modelled zone initially extends in more westerly direction, and then in more northerly direction, and as a result the numerically modelled zone is located further to the west. There are areas that are covered by the numerically modelled zone, but not by the T+T zone. These areas include land south of Fernhill and west of Flaxmere. Both cases can be explained by the fact that the T+T zone uses only flow direction and gradient in a pumping location, whilst the numerical model uses a complex flow field that is a result of model simulation. Therefore, the numerical model accounts for changes of flow direction and gradient along the particle pathway and the derived zone accounts for this. The numerical model also accounts for impacts of other pumping on groundwater flow such as Napier City Council pumping, which has its own capture zone and impacts the flow field.

3.5.2 Porosity

T+T uses a conservative estimate of porosity of 0.02. Porosity calibrated in a numerical model is highly variable spatially and between realisations. In the area of interest the numerical model mean porosity is 0.1, with quantile range Q10 – Q90 of 0.03 to 0.15, which is higher than assumed by T+T. Higher porosity would result in lower travel velocity and smaller capture zone. The 10 year travel time capture zone is equivalent to using porosity of 0.01, which is even lower than porosity used by T+T and therefore more conservative for delineation of capture zones.

4 Further work

This numerical particle tracking assessment could be further improved by:

- Re-running the assessment with lower porosity instead of longer run time. This would require significant running and re-processing time; or
- Extending the simulation time (e.g. doubling it to 20 years) to allow for release of all particles during the simulation.

In addition, GNS Science is leading a major MBIE funded programme of research (Te Whakaheke o te Wai) to develop methodologies for rapid upscaling and downscaling of groundwater models to incorporate spatial variability of parameters, that both the Heretaunga numerical model and the WhAEM model were unable to fully represent. These methodologies are intended to be deployed throughout New Zealand, but the method development and testing will focus on the Heretaunga Plains.

As noted by the reviewer of this report (Appendix 1), while the numerical modelling presented here may be considered more appropriate than the WhAEM modelling approach, new science in the near future will improve the accuracy and greatly reduce the predictive uncertainty of SPZs developed using the best science that is currently available. Therefore, a flexible approach to SPZ delineation in planning instruments is recommended, so that SPZ maps may be revised without difficulty or delay, as new science is developed.

5 Conclusions

The numerical modelling work undertaken in this assessment provides an alternative to source protection zones delineated by T+T using the WhAEM approach. The extent of zones from each modelling approach is different, due to differences in methodology. It was shown that the numerical method may be more appropriate for a complex system such as the Heretaunga Aquifer System.

The one-year travel time zone indicates that the public water supply bores, especially Portsmouth and Wilson, may be at risk of contamination from a very wide catchment via the Ngaruroro River.

The 10-year travel time zone, designed to conservatively delineate risk of pathogen contamination, is very extensive. The prediction is very conservative, and it may be difficult to improve the certainty of it with available methods. Furthermore, it may be impractical to completely protect such a large area from risk of pathogen contamination. Alternatively, it may be preferred to use the one-year travel time zone to establish source protection zones for non-pathogenic contaminants, and accept the residual risk on microbial contamination which can be managed using the multi-barrier approach to managing risk of contamination (e.g. treatment).

In the confined aquifer, source protection zones may be treated differently due to lower level of risk. However, more work is required to accurately identify all locations with artesian conditions.

While the numerical modelling presented here may be considered more appropriate than the WhAEM modelling approach, new science in the near future will further improve the accuracy and greatly reduce the predictive uncertainty of SPZs developed using the best science that is currently available. Therefore, a flexible approach to SPZ delineation in planning instruments is recommended, so that SPZ maps may be revised without difficulty or delay, as new science is developed.

6 Acknowledgement

Dr Catherine Moore (GNS Science) is sincerely thanked for reviewing a draft of this report. There was little time available for the review and Dr Moore's commitment and carefully considered letter report are greatly appreciated.

7 Further documentation

Plots for all realisations and scenarios are appended to this report (Appendix B and C)

In addition, model files (modflow, modpath, PEST, post processing) are also available for download from gitlab:

https://gitlab.com/crayfisher/modpath_scenarios_heretuanga.git

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9 Appendix A peer review letter

Note: following the review by GNS, HBRC have undertaken an editorial review of this report.



15 January 2019

Groundwater Modeller
Hawkes Bay Regional Council
159 Dalton St
Napier 4110

Attention: Paweł Rakowski

1 Fairway Drive, Avalon
Lower Hutt 5010
PO Box 30388
Lower Hutt 5040
New Zealand
T +64-4-570 1444
F +64-4-570 4600
www.gns.cri.nz

Dear Paweł,

**Peer Review: Stochastic Source Protection Delineation in Heretaunga Aquifer
Using a Numerical Groundwater Model: Description of Methodology and
Results for Hastings District Council Municipal Bores**

1.0 BACKGROUND

Hawkes Bay Regional Council have undertaken a stochastic source protection zone (SPZ) delineation analysis for the Hastings District Council municipal water supply wells which are grouped into four bore-fields; Eastbourne Street, Frimley Park, Wilson Road and Portsmouth Road. This work was undertaken to provide an alternative to the source protection zones delineated by Tonkin and Taylor (2018), which adopted the well head analytic model (WhAEM) software from the USEPA, to delineate the SPZ's.

GNS Science (GNS) was commissioned by Hawkes Bay Regional Council (HBRC), to provide a brief review of the methodology adopted for this stochastic source protection groundwater modelling work, and the brief reporting of that work (Rakowski 2018). Note that the author of this review, Catherine Moore, also reviewed the Tonkin and Taylor SPZ delineation report.

This review does not include any examination of the groundwater data in the area nor the numerical model used to undertake the analysis and is restricted to commenting on the adopted methodology. Nor does this review comment on wording or expression in the Rakowski (2018) report.

2.0 MODELLING METHODOLOGY ADOPTED

The stochastic source protection zone delineation methodology as reported, which uses particle tracking with a numerical groundwater model, is considered robust. The workflow detailed in the report, while preliminary, is considered state of the art. Some approximations,

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and improvements that can be undertaken, are detailed in the report. Two additional issues are discussed below. However, the delineated source protection zones provide an alternative to those delineated by Tonkin and Taylor (2018).

The 10-year travel time work-around used to accommodate the low effective porosities that correspond to the small discrete highly permeable pathways capable of very rapid groundwater transport, is considered acceptable as an interim approach for assessing the source protection zones required for pathogen contamination risk. This 10-year travel time SPZ can be compared with the SPZ2 in the Tonkin and Taylor report (in particular with the version of the zones that allow for the 25-degree variation in groundwater flow direction).

Preliminary work by ESR (Scott and Moore 2019) indicates that there may be significant corruption of the variance and bias terms of travel time probability distributions when upscaling highly heterogeneous alluvial aquifers; this study investigated upscaling errors when moving from a 10cm to a 5m numerical grid. Such corruption, and likely underestimation of the predictive probability distribution is likely with a 100m grid scale used in the Heretaunga Plains numerical model. This issue is the subject of current research (MBIE funded – Te Whakeheke O Te Wai project). It is expected that in future work, local refinements of the Heretaunga Plains model grid in the area around the well fields will allow a more robust assessment of the local travel time risks.

3.0 COMMENT ON COMPARISON WITH TONKIN AND TAYLOR RESULTS

Both the simple WhAEM approach and the more complex numerical method applied by Hawkes Bay Regional Council are fully described in the GNS 2014 Envirolink Report – Capture Zone (Moreau et al. 2014).

Tonkin and Taylor adopted the simple WhAEM modelling approach based on the rationale that this was appropriate given the time-frame available for this study, and when used with appropriate model inputs and assumptions can represent a fit for purpose model for the delineation of SPZ's. The WhAEM software utilises a simple one-layer homogeneous aquifer representation of groundwater flow around and towards each well.

It was noted in the GNS review of the Tonkin and Taylor report:

"Simple models can be built and calibrated more quickly than complex models. However, they must be used with caution. Doherty and Moore (2017) discuss how the simpler the model, the more conservative its evaluation of predictive uncertainty needs to be. It also follows that the attractiveness of model complexity lies in the opportunities that it may present for reducing evaluated predictive uncertainty. The Tonkin and Taylor report recommend that future revisions of the SPZ consider the use of an extended model to allow explicit representation of the fast, permeable groundwater pathways, this may allow an opportunity for reducing the predictive uncertainty around the SPZ delineation."

This work by HBRC has essentially initiated this extended work using the current groundwater model of the Heretaunga Plains.

In general, the Tonkin and Taylor SPZ's are more conservative as they must be, when taking into account the variability of the groundwater flow directions as indicated in the sensitivity analysis plots. Note that these SPZ zones are not the same best estimate SPZ zones

superimposed with the HBRC SPZ's in the reviewed document. This conservatism results in greater restrictions to land use than when SPZ's are delineated using a more complex numerical model.

One particular discrepancy between the WhAEM zones and the 10-year SPZ based on the numerical model that warrant attention relates to the groundwater flow direction. The WhAEM capture zones are based on a single groundwater flow direction in the vicinity of the bore field, whereas the numerical model is able to accommodate the changing groundwater flow direction upgradient of the well field. The result of this changing groundwater flow direction is that the numerical model SPZ's extend initially in a westerly direction and then in a more northerly direction. Whereas the Tonkin and Taylor zones extend north-westerly.

This Tonkin and Taylor methodology is also less able to accommodate the flatter piezometric surface in the confined aquifer area, which results in a reduced downgradient capture area than the numerical model approach (e.g. for Eastbourne Street well field).

The consequence of this is that some of the area covered by the HBRC SPZ's are not covered by the Tonkin and Taylor SPZ's, unless the wide range of flow directions explored in the sensitivity analyses of that report are considered.

4.0 CONCLUSIONS AND RECOMMENDATIONS

The modelling approach adopted by HBRC for delineating the SPZ's for the four Hastings bore-fields is considered appropriate and represents an advance on the initial work by Tonkin and Taylor in that it accommodates more of the complexity of groundwater flow system, and in particular the groundwater flow directions and gradients.

It is recommended that future SPZ work in this area consider potential upscaling errors that can occur when upscaling model parameters in highly heterogeneous alluvial aquifers. One way that these errors can be quantified is using paired model analyses (Doherty and Christensen 2011). As noted this issue is the subject of the current collaborative research programme involving both Hawkes Bay Regional Council and GNS Science (MBIE funded – Te Whakeheke O Te Wai project).

Yours sincerely



Catherine Moore
Groundwater Modelling Team

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